

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

In the Matter of	)	
	)	
New Part 4 of the Commission's Rules	)	ET Docket No. 04-35
Concerning Disruptions to	)	
Communications	)	

**COMMENTS OF INTRADO INC.**

Intrado Inc. (Intrado)<sup>1</sup> hereby submits these comments in response to the Federal Communication Commission's (Commission) Notice of Proposed Rulemaking (NPRM) for the New Part 4 of the Commission's Rules Concerning Disruptions to Communications.<sup>2</sup> The Commission proposes to amend the scope of the current reporting requirements by applying them to a broader group of communications providers, developing a common metric applicable to various types of communications providers, and facilitating the process of reporting outages and subsequent final reports.

**DISCUSSION**

Intrado supports the Commission's conclusion that a data-driven, self improvement model of reporting outages is most useful in creating resilient networks that can deter or mitigate the occurrence of outages impacting crucial public safety and commerce communication systems. Intrado also supports the Commission's goal to simplify the requirements for reporting communications outages that potentially affect

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<sup>1</sup> Founded in 1979, Intrado (NasdaqNM: TRDO) is the nation's leading provider of sophisticated solutions that identify, manage and deliver mission critical information for telecommunications providers and public safety organizations.

911 service. To be effective, however, a 911 service outage reporting scheme must account for the multi-layered vendor distribution for 911 services. Indeed, because there may be a number of entities providing various discrete 911 services, determining which service provider is responsible for a particular service outage could be difficult.<sup>3</sup> Moreover, while a service outage may be felt by multiple service providers, and while such providers may accurately report the problems affecting the discrete services for which they are responsible, it may well be that no single provider has a sufficiently broad understanding of the situation to address a systemic outage. Finally, seemingly discrete service “glitches” that themselves do not rise to the level of reportable service outages may nonetheless result in a reportable service outage when they occur simultaneously or sequentially. Such “glitches” may not receive the attention they require and may cause an outage that could have been avoided.

Absent some coordination, requiring each service provider in the 911 “chain” to report outages could lead to confusion and erroneous root cause conclusions. Such consequences clearly run counter to the data driven, self improvement model envisioned by the Commission. Therefore, Intrado believes that the Commission should promulgate rules that promote coordinated service outage reporting by the 911 services provider. Downstream reporting responsibilities would be determined via contractual arrangements among the various service providers. This reporting methodology will

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<sup>2</sup> Notice of proposed Rulemaking, FCC 04-30, rel. February 23, 2004

<sup>3</sup> Wireless 911 service deployment provides a good example of this multi-layered vendor model. Wireless carriers often rely on third party hosted solutions to meet the Commission’s E911 location data requirements. 911 Service Providers (typically, the incumbent local exchange carriers (“ILECs”)) that provide 911 services to PSAPs generally also provide the facilities used to transport 911 calls to the PSAPs. In the event of a PSAP isolation or 911 tandem outage, a wireless carrier may not be aware of the situation. The 911 service provider may not know the true number of end users impacted by the tandem outage, and while the ILEC may be able to redirect its own subscriber traffic, it can do little to address end user traffic of other communications providers.

best serve the Commission's stated goals and will reduce the likelihood of confusion at the affected PSAP(s).

Intrado agrees that service providers should be able to report outage electronically, and Intrado notes that such a reporting mechanism already exists within the Department of Homeland Security. The National Coordinating Center for Telecommunications<sup>4</sup> ("NCC") and the Telecom Information Sharing and Analysis Center ("Telecom-ISAC") coordinate the initiation, restoration, and reconstitution of United States national security and emergency preparedness telecommunications services both nationally and abroad. The NCC has an established working relationship with Telecom-ISAC members, communications providers, and the federal government, making NCC a good choice to receive and disseminate 911-affecting service outage reports. Intrado believes that the existing reporting activities of the NCC could be leveraged effectively to attain the Commission's goals in this NPRM while minimizing the impact upon communications providers.

### **CONCLUSION**

Intrado supports the Commission's efforts to simplify reporting requirements for 911. However, given the complexity of current and evolving service arrangements and communications platforms, imposing distinct reporting requirements on each service provider in the 911 "chain" would create a myriad of uncoordinated data that might lead to erroneous conclusions. The Commission should promulgate rules that foster collaborative and unified reporting requirements among interrelated communications and service providers. Furthermore, electronic reporting requirements should take into

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<sup>4</sup> See <http://www.ncs.gov/ncc>.

consideration existing reporting and monitoring activities within the Department of Homeland Security.

Respectfully Submitted,

| /s/ [Mary Boyd](#)

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